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UTAH NATIVE PLANT SOCIETY

Reply to: P. O. Box 6257
SLC UT 84106

October 15, 1982

JIM
OCT 19 1982

State of Utah Natural Resources & Energy
Division of Oil, Gas & Mining
4241 State Office Building
Salt Lake City UT 84114

Re: Tentative approval to
commence surface humate mining
Applicant: Westwater, Incorporated
Harley Dome Minerals Mine

Gentlemen:

Concern is expressed over the tentative approval of the mining plan submitted by Westwater, Incorporated as follows:

- (1) Is Westwater, Incorporated legally organized to do business in the state of Utah? The Secretary of State's Office reveals no foreign registration by Westwater if it is not a Utah corporation, nor is there a listing by this entity as a Utah corporation.
- (2) The environmental assessment was prepared for an organization referred to as "Baker Associates, Inc." Again, the Secretary of State's Office shows no listing for this entity. Why has the mining plan been submitted in the name of Westwater, Incorporated? What is the relationship between these two entities? Since Baker Associates, Inc. was the successful bidder and the EA was prepared based only on the proposed actions of Baker, any legal problems should be resolved prior to final approval.
- (3) The EA outlines specific mitigation measures for protecting/collecting plant fossils. While the EA contains these items, the mining operation plan to be approved by the state should specifically refer to these mitigation measures in view of the significant need for protection. This would help ensure that the mitigation measures are in fact followed.

Thank you for this opportunity to comment.

RECEIVED

OCT 18 1982

DIVISION OF
OIL, GAS & MINING

Very truly yours,

UTAH NATIVE PLANT SOCIETY

Anthony J. Frates
Anthony J. Frates - President